

We own and/or operate four radio stations and have a joint sales agreement with a fifth. Those five stations are in three different locations. The expense involved with setting up around-the-clock recording for those five stations in three different locations would be substantial. That would be only one step in the whole process. Where and how do we store a combined 840 hours of recording each week? Three-thousand sixty hours per month? Forty-thousand three hundred twenty hours each year? It's mind boggling. We are a small family-owned operation. Expenses are always a major consideration. We would not only have to purchase the recording equipment, storage capability, but also hire personnel to oversee the recording, cataloging and storage of all this. This proposed rule would be onerous and is an example of painting the entire broadcast industry with a broad paintbrush. The actual numbers of broadcasters who have violated the indecency statute is miniscule. Why punish the entire broadcast sector for an extremely small percentage of violations. Move on from the incident during halftime of the Super Bowl. That was an isolated incident precipitated by publicity seeking recording artists. It in no way ever represented the owners, managers or staffs of any radio station I have ever been associated with. We police our own. Our community and listeners also let us know what they find acceptable or not acceptable. We don't need added expenses, responsibilities and regulations.
Thank you.

Ted Peiffer
General Manager
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